

BEFORE THE
POSTAL REGULATORY COMMISSION

Annual Compliance Report, 2016

: Docket No. ACR2016
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UNITED PARCEL SERVICE, INC.'S SUPPLEMENTAL
MOTION FOR ACCESS
(January 11, 2017)

United Parcel Service, Inc. ("UPS") respectfully submits this Supplemental Motion for Access pursuant to Commission Rules 3001.21 and 3007.50, requesting that an additional outside counsel have access to non-public library references (USPS-FY2016-NP10, USPS-FY2016-NP11, USPS-FY2016-NP12, and USPS-FY2016-NP13), which the United States Postal Service ("Postal Service") filed with the Commission on December 29, 2016, as part of the Postal Service's Annual Compliance Report ("ACR") for fiscal year ("FY") 2016.

UPS filed its original Motion for Access on January 4, 2014. *See* United Parcel Service, Inc.'s Motion for Access, Dkt. No. ARC2016 (Jan. 4, 2017). That motion was granted on January 10, 2017, pursuant to which a number of UPS outside counsel and consultants were granted access to the requested materials. *See* Order Granting Access, Dkt. Nos. ARC2016, RM2017-1 (Jan. 10, 2017). An additional outside counsel, Scott E. Lerner, also requires access to these same materials. Mr. Lerner has signed and agreed to the Standard Certification of Compliance with Protective Conditions, attached hereto as Exhibit A. Accordingly, UPS respectfully requests that access be granted to Mr. Lerner.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By: /s/ Steig D. Olson

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